



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/EJD  
F. #2021R00184

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 16, 2022

By E-mail

The Hon. James R. Cho  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Fan "Frank" Liu, Matthew Zibirus and Qiang "Jason" Sun  
22-MJ-257 (MMH)

Dear Judge Cho:

The government respectfully moves for an order (1) de-designating the criminal complaint and arrest warrant in the above referenced case as Highly Sensitive Documents ("HSDs"); and (2) unsealing the complaint and arrest warrant in the above-captioned matter. The government has determined that the bases previously articulated for sealing the matter and designating the complaint and arrest warrant as HSDs no longer apply.

Please note that the government is not currently moving to de-designate as HSD or unseal the application and accompanying Order to designate the above captioned materials as HSD filed under the same docket number on March 9, 2022.

Respectfully submitted,

BREON PEACE  
United States Attorney

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Enclosure